

August 21, 2020

**VIA FEDERAL EXPRESS and  
ELECTRONIC MAIL**

Christopher A. Koch, Ed. D.  
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**Re: Comments to Appeal Decision**

Dr. Koch:

Please accept this letter as Franklin College's Comments to the recent decision of the Ad Hoc Appeal Panel for the Council for the Accreditation of Educator Preparation (CAEP) to affirm the revocation of CAEP's accreditation of the College's Initial Licensure Level Program.

As presented to the Appeal Panel, the College strongly disagrees with the decision because it was based solely on the College's failure to follow CAEP's procedures and not the quality of the College's program. CAEP's finding that the College failed to satisfy its Standards was grounded on the conclusion that no evidence was submitted by the College when in fact over sixty-four (64) exhibits were submitted but ignored by CAEP. If the exhibits had been considered, CAEP would have concluded that the College's program satisfied CAEP's standards for accreditation. In addition, throughout the decision, CAEP made numerous inconsistent findings for the same Components of a Standard. For these reasons, the revocation was arbitrary, capricious, an abuse of discretion and violated the due process rights of the College.

CAEP's decision reflects a strict adherence to process instead of a thorough investigation and review of the substance and quality of the College's education program, which was evident by CAEP's failure to consider the evidence that the College submitted of national recognition of the College's program and the highest approval it has received from school employers of its elementary teachers.

During its appeal, the College notified CAEP that it had taken immediate steps to replace those responsible for the failure to present the College's evidence in support of CAEP's standards in the format required by CAEP and who failed to follow CAEP's

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procedures in the presentation of evidence. If the College elects to seek accreditation by CAEP and begin the application process in the future, rest assured that the College has competent personnel who will follow CAEP's procedures to ensure that its program receives CAEP's accreditation.

Please allow this letter to be part of Franklin College's accreditation record, made available to the Indiana Department of Education and published on CAEP's website as soon as possible.

Please confirm receipt of my letter and advise as to the date it is published to CAEP's website. If you have any questions, please contact me.

Sincerely,



Kerry N. Prather  
President

cc: James Due, Chairman, Franklin College Board of Trustees (via email)  
Stephen Huddleston, General Counsel, Franklin College (via email)  
Scott J. Bogan, Indiana Department of Education (via email)  
Renee Baratta, Indiana Department of Education (via email)  
Dr. Vince O'Neill, CAEP Accreditation Director (via email)